

The following is taken from the August 2013 NDE State and Federal Grant Management Requirements and Guidance, pages 41-47

6. Time-and-Effort Reporting

Portions of the following information are excerpted directly from USDE Time and Effort Reporting Guidance, Enclosures A, B, & C (September 7, 2012)

These documents are available in their entirety at <http://www2.ed.gov/policy/fund/guid/gposbul/time-and-effort-reporting.html>.

Federal funds may only be used for employee compensation if appropriate “time-and-effort” records are maintained. Time-and-effort reporting is important in ensuring that Federal program funds are used to pay only their proportionate share of personnel costs.

Under the Appendix to 2 C.F.R. Part 225 (formerly OMB Circular A-87), time-and-effort reporting for an employee whose salary is supported by only one Federal program or cost objective may be prepared on just a semiannual basis. Employees supported by multiple cost objectives, however, must provide a monthly Personnel Activity Report (PAR) or equivalent documentation supporting their time and effort. In practice, however, many of the individuals submitting monthly PARs may have schedules that do not change from week to week, meaning that they carry out the same duties for the same amount of time each pay period and thus submit the same documentation every month.

Single Cost Objective

The criteria for whether an employee may document time and effort using a semiannual certification or must fill out a monthly PAR can be confusing. As noted above, an employee who works on a single Federal program or cost objective needs to file only a semiannual certification as the basis for time-and-effort documentation. A single cost objective can be, for example, a single function or a single grant or single activity. It is possible to work on a single cost objective even if an employee works on more than one Federal award or on a Federal award and a non-Federal award. The key is determining whether an employee is working on a single cost objective is whether the employee’s salary and wages can be supported *in full* from each of the Federal awards on which the employee is working, or from the Federal award alone if the employee’s salary is also paid with non-Federal funds.

Semiannual Certifications

If an employee works solely on a single Federal award or cost objective, charges for the employee’s salary and wages must be supported by periodic certifications that the employee worked solely on that program or cost objective for the period covered by the certification. Those certifications must be:

- Prepared at least semiannually.
- Signed by the employee or supervisory official having firsthand knowledge of the work performed by the employee.

Monthly Certifications

An employee must complete a PAR if he or she works on multiple activities or cost objectives. For example, a PAR is generally required if an employee works on more than one Federal program or a Federal program and a non-Federal program. It is possible, however for multiple programs to have the same cost objective, which creates confusion over whether the presence

of a single cost objective or being funded by multiple programs should determine what time-and-effort documentation an employee must complete.

Personnel Activity Reports (PARs)

If an employee works on multiple activities or cost objectives, a distribution of the employee's salary and wages must be supported by a personnel activity report (PAR) or equivalent documentation.

The following instances of multiple activities or cost objectives require a PAR. An employee works on:

- More than one Federal award.
- A Federal award and a non-Federal award.
- An indirect cost activity and a direct cost activity
- Two or more indirect activities that are allocated using different allocation bases
- An unallowable activity and a direct or indirect cost activity.

A Personnel Activity Report (PAR) must:

- Reflect an after-the-fact distribution of the actual activity of the employee.
- Account for the total activity for which each employee is compensated.
- Be prepared at least monthly and coincide with one or more pay periods
- Be signed by the employee AND supervisory official having firsthand knowledge of the work performed by the employee.

Nebraska's Substitute Reporting System

In September 2012, the United States Department of Education (USDE) provided an opportunity for State Educational Agencies to establish a substitute system for time and effort reporting. NDE has established the following substitute system for time and effort reporting beginning with the 2013-14 school year.

1. To be eligible to document time and effort under the substitute system, employees must
 - a. Currently work on a schedule that includes multiple activities or cost objectives that must be supported by monthly personnel activity reports;
 - b. Work on specific activities or cost objectives based on a predetermined schedule; and
 - c. Not work on multiple activities or cost objectives at the exact time on their schedule.
2. Under the substitute system, in lieu of personnel activity reports, eligible employees may support a distribution of their salaries and wages through documentation of an established work schedule that meets the standards under section 3. An acceptable work schedule may be in a style and format already used by the District.
3. Employee schedules must:
 - a. Indicate the specific activity or cost objective that the employee worked on for each segment of the employee's schedule;
 - b. Account for the total hours for which each employee is compensated during the period reflected on the employee's schedule; and

- c. Be certified at least semiannually and signed by the employee AND a supervisory official having firsthand knowledge of the work performed by the employee.
4. Any revisions to an employee's established schedule that continue for **2 weeks or more** must be documented and certified in accordance with the requirements in section 3.
5. Any significant deviations from an employee's established schedule, that require the employee to work on multiple activities or cost objectives at the exact same time, including but not limited to lengthy, unanticipated schedule changes, must be documented by the employee using a Personnel Activity Report (PAR) that covers the period during which the deviations occurred.

If an employee meets the above requirements, semiannual certification, supported by a set schedule, will be accepted.

Examples of When a Semiannual Certification is Allowable and When a Monthly Personnel Activity Report (PAR) is Required

Some of the examples below have been provided by USDE, while others are being provided by NDE.

1. **Title I, Part A funds and State compensatory education funds**

A district supports a supplemental math teacher to serve low-achieving students with 50 percent Title I, Part A funds and 50 percent State compensatory education funds.

Teaching math to low-achieving students is a single cost objective because it can be fully supported under Title I, Part A. Only semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.

2. **Title I, Part A funds and local funds**

A teacher in a Title I schoolwide school is paid with local funds to teach first grade in the morning to decrease class size for reading and is paid with Title I, Part A funds to teach a supplemental reading class in the afternoon. (The school has a sufficient number of first-grade teachers to meet the requirements of ESEA section 1114(a)(2)(B).)

Because the part-time first-grade teacher is not needed in order to provide the basic education program in the schoolwide program school, her salary could be supported with Title I, Part A funds, even though it is not. Similarly, her salary for providing supplemental reading could be supported with Title I, Part A funds. Both her functions, therefore, are fully supportable with Title I, Part A funds, and the schoolwide program constitutes a single cost objective. Only a semiannual certification, therefore, is required even though the teacher's salary is supported by a Federal award and local funds and she conducts two different activities.

3. **Funds under Section 611 and 619 of the Individuals with Disabilities Education Act (IDEA)**

A preschool special education teacher is funded with 50 percent IDEA section 611 funds and 50 percent with IDEA section 619 funds.

Teaching preschool special education is an allowable activity under both IDEA sections 611 and 619. Accordingly, the teacher is performing a single cost objective even though she is supported with funds from two separate Federal awards; therefore she need only file a semiannual certification.

4. **Title I, Part A Funds and CEIS (Comprehensive Early Intervening Services) funds under IDEA**

A teacher works with low-achieving students and is supported with 60 percent Title I, Part A funds and 40 percent CEIS funds.

Teaching low-achieving students is a single cost objective because it can be fully supported under Title I, Part A and CEIS. Only a semiannual certification therefore is required even though the employee's salary is supported by two Federal awards.

5. **Title I, Part A funds and Local Funds**

A district supports an elementary school teacher with local funds but pay her with Title I, Part A funds to provide after-school tutoring for low-achieving students.

Although the teacher could not be paid with Title I, Part A funds to provide elementary education, the portion of her time spent on after-school tutoring is easily separated from her teaching position by her schedule. Accordingly, the teacher's after-school tutoring is a single cost objective and she need only file a semiannual certification for the time she works in the after-school program supported by Title I, Part A funds.

6. **Funds under Sections 611 of the Individuals with Disabilities Education Act (IDEA) and State reimbursable local education funds.**

- a. An LEA supports a special education teacher serving school age children with disabilities students with 50 percent Section 611 IDEA funds and 50 percent State reimbursable local education funds.

Special Education services provided to school age students is a single cost objective because it can be fully supported under Section 611 IDEA (ages 0-21). Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.

- b. An LEA supports a special education teacher serving school age and birth to age five children with disabilities students with Section 611 IDEA funds and State reimbursable local education funds.

Special Education services provided to school age and birth to age five students in this case is not a single cost objective. The objectives can be fully supported under Section 611 IDEA (ages 0-21), however; State reimbursable local funds

cannot support the birth to age five objective. A personnel activity report (PAR) is required.

7. Funds under Sections 611 of the Individuals with Disabilities Education Act (IDEA) and non-reimbursable local education funds.

An LEA supports a special education teacher serving birth to age five children with disabilities students with Section 611 IDEA funds and non-reimbursable local education funds.

Special Education services provided to birth to age five students is a single cost objective because it can be fully supported under Section 611 IDEA (ages 0-21). Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.

8. Funds under Sections 611 and Section 619 of the Individuals with Disabilities Education Act (IDEA) funds.

An LEA supports a special education teacher serving birth to age five children with disabilities students with Section 611 and Section 619 IDEA funds.

Special Education services provided to birth to age five students in this case not a single cost objective. The objectives can be fully supported under Section 611 IDEA (ages 0-21), however; Section 619 IDEA funds can only support age three and four year old services objective. A personnel activity report (PAR) is required.

9. Funds under Sections 619 of the Individuals with Disabilities Education Act (IDEA) and non-reimbursable local education funds.

An LEA supports a special education teacher serving age three and four year old children with disabilities students with Section 619 IDEA funds and non-reimbursable local education funds.

Special Education services provided to age three and four students is a single cost objective because it can be fully supported under Section 619 IDEA (ages 3-4). Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.

10. Funds under Sections 611 of the Individuals with Disabilities Education Act (IDEA) and local general education funds.

An LEA supports a teacher endorsed in special education serving both special education and regular education classes.

Special Education services and general education services provided to school age students is not a single cost objective which cannot be fully supported under Section 611 IDEA (ages 0-21). A personnel activity report (PAR) is required.

11. Funds under Sections 611 of the Individuals with Disabilities Education Act (IDEA).

- a. An LEA supports a special education teacher serving school age children with disabilities students and at-risk students in an approved CEIS project.

The services provided to school age children with disabilities and services provided to the CEIS project students are not a single cost objective. A personnel activity report (PAR) is required.

- b. An LEA supports a special education teacher serving school age children with disabilities students and non-public children with disabilities students.

The special education services provided to school age children with disabilities and services provided to the non-public students with disabilities are not a single cost objective. A personnel activity report (PAR) is required.

12. State leadership funds under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) and State funds

A State curriculum specialist who develops new career and technical education courses and initiatives is funded 50 percent with Perkins IV funds reserved under section 112(a)(2) for State leadership and 50 percent with State general funds.

Career and Technical Education curriculum development is a single cost objective because it can be fully supported with State leadership funds under Perkins IV. Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and State funds.

13. ESEA Title VII, Part A formula grant funds and state/local funds

A high school math teacher's regular salary is paid with State and local funds. The teacher conducts an after-school support program for Native American students in the school, and also teaches at a summer academic camp for Native American students in the school district; for both of these activities, he is paid from Title VII, Part A funds. Although the teacher could not be paid with Title VII, Part A funds to teach high school math, the portion that the teacher is paid with Title VII, Part A funds is easily segregated from his daily teaching schedule. Accordingly, the teacher's after-school and summer activities are each a single cost objective and the teacher need only file a semiannual certification for the time he is paid with Title VII, Part A funds.

14. Title I-A Schoolwide Projects

If a school operating a schoolwide program consolidates Federal, State, and local funds under section 1114(a)(3) in a consolidated schoolwide pool (see E-2), an employee who is paid with funds from that pool is not required to file a semiannual certification. Because Federal funds are consolidated with State and local funds in a single consolidated schoolwide pool, there is no distinction between staff paid with Federal funds and staff paid with State or local funds.

If a school operating a schoolwide program does not consolidate Federal funds with State and local funds in a consolidated schoolwide pool, an employee who

works, in whole or in part, on a Federal program or cost objective must meet the OMB Circular A-87 requirements as follows:

- i. An employee who works solely on a single cost objective (i.e., a single Federal program whose funds have not been consolidated or Federal programs whose funds have been consolidated but not with State and local funds) must furnish a semiannual certification that he/she has been engaged solely in activities supported by the applicable source in accordance with OMB Circular A-87.
- ii. An employee who works on multiple activities or cost objectives (i.e., in part on a Federal program whose funds have not been consolidated in a consolidated schoolwide pool and in part on Federal programs supported with funds that have been consolidated in a pool or on activities funded from other revenue sources) must maintain time and effort distribution records in accordance with OMB Circular A-87. The employee must document the portion of time and effort dedicated to:
 1. The Federal program; and
 2. Each program or other cost objective supported by either consolidated Federal funds or other revenue sources.
 - a. Semiannual certification is allowable IF the employee has a set schedule. See “Nebraska’s Substitute Reporting System” above (beginning on page 42).

Sample Time and Effort Logs are available on the NDE Federal Programs website, <http://www.education.ne.gov/federalprograms/TimeandEffortLog.html>.